

EXHIBIT

I

Shelly Bloor

From: Will Cochran
Sent: Wednesday, February 26, 2020 4:55 PM
To: Chris Williams
Subject: FW: *Notices to Take Depositions - Powell, et al. v. Oldham

From: Frank Watson <fwatson@watsonburns.com>
Sent: Monday, January 13, 2020 12:32 PM
To: Frank Watson <fwatson@watsonburns.com>; rcraddock@wyattfirm.com; ohorton@wyattfirm.com
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Subject: RE: *Notices to Take Depositions - Powell, et al. v. Oldham

Dear Defense Counsel:

I now understand that the defendants want to reschedule Ed Raper's deposition from 1/22 to some other date. What is the problem getting this deposition set?

I would recommend sometime in the first two weeks in February. If we cannot agree on a date between now and then, the Plaintiffs will simply be forced to file a Notice with a given date.

Brad Trammell: can you check on the availability dates of Paul Zigler for February? Also, let me know if your client will make us go to Dallas or whether we can depose Mr. Zigler here in Memphis, which would be much more convenient for all counsel.

Sincerely,

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Subject: RE: *Notices to Take Depositions - Powell, et al. v. Oldham

Dear Defense Counsel:

I understand that yet another Scheduling Order is being advocated by defense counsel. Can you let us know when we might receive same? Additionally, we are planning on conducting depositions on 1/22 (Ed Rapper) and 1/29 (named Plaintiffs). Am I correct?

Many thanks

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Subject: *Notices to Take Depositions - Powell, et al. v. Oldham

Please feel free to contact me if you should have any questions or have any problems viewing the attachments.

CYNDI WATKINS
Secretary



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